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June 17, 2022

*By Electronic Filing*

The Honorable Loretta A. Preska  
United States District Judge  
United States District Court for the Southern  
District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: SEC v. Sason, et al., 19 Civ. 1459 (LAP) (SDNY)

Dear Judge Preska:

Defendant Marc Manuel, by and through his counsel, hereby requests leave to file under seal exhibits 59, 66, 68, and 69 to the Declaration of Marjorie J. Peerce in support of the Magna Defendants' Motion for Summary Judgment in the above-referenced case, pursuant to the Protective Order in this action (DE 88). These exhibits are Federal Bureau of Investigation Forms 302 and handwritten notes of meetings with Izak Zirk Engelbrecht/de Maison, which were produced, pursuant to Touhy requests, by the United States Department of Justice pursuant to the Protective Order, and they contain confidential and sensitive information.

Per discussion with chambers, counsel for Manuel will e-file the sealed documents with "Selected Parties" viewing access and subsequently email PDFs of this letter and those exhibits to the Court.

We are of course available to answer any questions Your Honor may have.

Respectfully,

**SO ORDERED.**

Dated: June 21, 2022

New York, New York

**BALLARD SPAHR LLP**

/s/ Marjorie Peerce

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LORETTA A. PRESKA

Senior United States District Judge

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June 17, 2022  
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*Attorneys for Defendant Marc Manuel*

DLA/sdm  
Enclosures

CC: All counsel of record (via ECF)